

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Jeffrey W. Dulberg (CA State Bar No. 181200) Jeffrey P. Nolan (CA State Bar No. 158923) PACHULSKI STANG ZIEHL & JONES LLP 10100 Santa Monica Blvd., 13 <sup>th</sup> Floor Los Angeles, CA 90067 Telephone: (310) 277-6910; Facsimile: (310) 201-0760 Email: <a href="mailto:jpomerantz@pszilaw.com">jpomerantz@pszilaw.com</a> , <a href="mailto:jdulberg@pszilaw.com">jdulberg@pszilaw.com</a> , <a href="mailto:jnolan@pszilaw.com">jnolan@pszilaw.com</a> <input type="checkbox"/> Debtor(s) appearing without an attorney <input checked="" type="checkbox"/> Attorney to: Counsel to Bradley D. Sharp, Chapter 11 Trustee for Estate of Leslie Klein	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION</b>	
In re:  LESLIE KLEIN,	CASE NO.: 2:23-bk-10990-SK CHAPTER: 11
	<b>NOTICE OF MOTION FOR ORDER WITHOUT HEARING PURSUANT TO LBR 9013-1(o)</b>
Debtor(s).	[No hearing unless requested in writing]

**TO THE U.S. TRUSTEE AND ALL PARTIES IN INTEREST. PLEASE TAKE NOTICE THAT:**

1. Movant(s) Bradley D. Sharp, Chapter 11 Trustee for Estate of Leslie Klein, has filed a motion entitled Motion Of Chapter 11 Trustee, For Order Authorizing The Examination Of Wells Fargo Bank, N.A. And Its Subsidiaries And Affiliates Pursuant To Fed. R. Bankr. P. 2004; Memorandum Of Points And Authorities; Declarations Of Bradley D. Sharp, Nicholas R. Troszak And Jeffrey P. Nolan In Support Thereof
2. Movant(s) is requesting that the court grant the motion without a hearing, as provided for in LBR 9013-1(o).
3. The motion is based upon the legal and factual grounds set forth in the motion and briefly described in the attached description of relief sought. (*Check appropriate box below*):  
☐ The full motion is attached hereto; or  
☒ The full motion has been filed with the court as docket entry # 438 and a detailed description of the relief sought is attached to this notice.
4. **DEADLINE FOR FILING AND SERVING OPPOSITION PAPERS AND REQUEST FOR A HEARING:** Pursuant to LBR 9013-1(o), any party objecting to the motion may request a hearing on the motion. The deadline for filing and serving a written opposition and request for a hearing is 14 days after the date of service of this notice, plus 3

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additional days if you were served by mail, electronically, or pursuant to F.R.Civ.P. 5(b)(2)(D), (E), or (F). If you fail to comply with this deadline, the court may treat such failure as a waiver of your right to oppose the motion and may grant the motion without further hearing and notice.

Date: October 17, 2023

Respectfully submitted,

/s/ Jeffrey P. Nolan

Signature of Movant or attorney for Movant

Jeffrey P. Nolan

Printed name of Movant or attorney for Movant

Attachment (Detailed description of relief sought):

The Motion seeks the production of records maintained by third-party financial institutions memorializing the facts surrounding the business and financial dealings of the Debtor. Numerous former clients of the Debtor have filed complaints in which they allege monies were improperly diverted by the Debtor. The Debtor has indicated he maintained no hard copies of financial records and minimal personal or business records, if any.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
10100 Santa Monica Blvd., 13<sup>th</sup> Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR ORDER WITHOUT HEARING PURSUANT TO LBR 9013-1(o)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* **October 17, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* **October 17, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Agent for Service-Wells Fargo Bank, N.A.  
Corporation Service Company, dba CSC Lawyers  
Incorporating Service  
27100 Gateway Oaks Drive, Suite 150N  
Sacramento, CA 95833

Wells Fargo Bank, N.A., Los Angeles Main Office  
333 S. Grand Avenue  
Los Angeles, CA 95833

Wells Fargo & Company  
Attn: Charles Scharf, CEO  
Corporate Headquarters  
420 Montgomery Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* **October 17, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/17/23

Rolanda Mori

/s/ Rolanda Mori

Date

Printed Name

Signature

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**ADDITIONAL SERVICE LIST:**

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **Simon Aron** saron@wrslawyers.com, moster@wrslawyers.com
- **Reem J Bello** rbello@goeforlaw.com, kmurphy@goeforlaw.com
- **Ron Bender** rb@lnbyg.com
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yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com
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cavila@elkinskalt.com;lwageman@elkinskalt.com;1648609420@filings.docketbird.com

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

Via Overnight Mail

Honorable Sandra Klein  
United States Bankruptcy Court  
Central District of California  
Edward R. Roybal Federal Building and Courthouse  
255 E. Temple Street, Suite 1582 / Courtroom 1575  
Los Angeles, CA 90012

Via Email

Nathan Talei  
[ntalei@ocslaw.com](mailto:ntalei@ocslaw.com)